

SURREBUTTAL TESTIMONY**PHILIP HAYET****ON BEHALF OF****THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF****DOCKET NO. 2023-9-E**

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.**

2 A. My name is Philip Hayet, and I am a Vice President and Principal of J. Kennedy
3 and Associates, Inc. ("Kennedy"). My business address is 570 Colonial Park Drive, Suite
4 305, Roswell, Georgia, 30075.

5 **Q. DID YOU PREVIOUSLY FILE DIRECT TESTIMONY IN THIS PROCEEDING?**

6 A. Yes, I filed Direct Testimony and one (1) exhibit on behalf of the South Carolina
7 Office of Regulatory Staff ("ORS") on June 27, 2023. My Direct Testimony supported
8 portions of the ORS report entitled, "Review of Dominion Energy South Carolina, Inc,
9 2023 Integrated Resource Plan Docket No. 2023-9-E" (the "Report") that Kennedy
10 prepared with ORS.¹ Kennedy's review of the Dominion Energy South Carolina, Inc.
11 ("DESC" or the "Company") 2023 Integrated Resource Plan (the "2023 IRP") included an
12 assessment of the Company's compliance with the statutory requirements of S.C. Code
13 Ann. § 58-37-40 ("Section 40").

14 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

15 A. The purpose of my testimony is to respond to the Rebuttal Testimony of DESC
16 witnesses Nicholas Wintermantel, Andrew Walker, James Neely, Scott Parker, and
17 Elizabeth Best, regarding the Company's reserve margin ("RM") target, commodity price

¹ A copy of the Report was attached to ORS Witness Anthony M. Sandonato's Direct Testimony as his Exhibit AMS-1. Mr. Sandonato's Direct Testimony has been adopted by ORS Witness Dawn Hipp.

forecasts, environmental modeling considerations, generic resource costs, coal retirements, replacement resource plans, and risk analysis.

Q. WHAT CONCLUSIONS DID YOU REACH REGARDING DESC'S 2023 IRP?

A. In Direct Testimony I noted that DESC complied with the requirements of Section 40,² and reasonably addressed the requirements contained in prior Commission Orders.³ However, ORS Witness Wellborn and I identified some issues with DESC's 2023 IRP, which led to a set of recommendations, including eight that ORS recommended the Company address in Rebuttal Testimony, and seven that ORS recommended the Company address in the Stakeholder Working Group.

Q. WHAT IS ORS'S CURRENT POSITION ON THE RECOMMENDATIONS AFTER THE COMPANY RESPONDED IN REBUTTAL TESTIMONY?

A. For convenience, Table 1 from my Direct Testimony is repeated here. Table 1 summarizes the fifteen recommendations and identifies the ORS witness (Hayet or Wellborn) that addresses each recommendation. ORS concluded the Company reasonably addressed each of ORS's recommendations. The remainder of my testimony explains the recommendations for which I was responsible, and ORS witness Wellborn explains in her Surrebuttal Testimony the recommendations for which she was responsible.

² See Section II A of the ORS Report, entitled "Compliance with Section 40 Requirements."

³ See Section II B of the ORS Report, entitled "Compliance with Prior Commission Orders."

1

Table 1

Item	ORS Recommendations	2023 IRP or Future IRP	Person Responsible
A1	Reserve Margin - DESC should fully document the extreme winter weather statistical analyses, and demonstrate that the models reasonably reflect winter loads during extreme low temperatures in future IRPs. The Company should also report on the Company's findings in the Stakeholder Working Group.	Future	Hayet
B1	Load Forecast - DESC should perform more detailed analyses to assess the reasonableness of its Residential and Commercial class peak load forecasts in future IRPs, and in particular, the Company should provide support for the assumption that the average peak load per residential and commercial customer will remain essentially constant over the forecast horizon.	Future	Wellborn
B2	Load Forecast - DESC should provide details in Rebuttal Testimony on the EV rate designs and load management programs the Company considers to mitigate EV impacts on peak demand and capacity need.	2023 IRP	Wellborn
C1	DSM - DESC should file the results of corrected High and Low DSM Sensitivity Cases in Rebuttal Testimony.	2023 IRP	Wellborn
D1	Commodity Forecasts - All commodity forecasts, including CO ₂ forecasts, should continue to be discussed in the Stakeholder Working Group. ORS's recommendation regarding CO ₂ forecasts is based on the fact that a CO ₂ tax has never been imposed at the Federal level or by the State of South Carolina, and there are renewable market incentives that could justify a lower price forecast, whereas pending CO ₂ rules under the Clean Air Act ("CAA") could justify a higher price forecast.	Future	Hayet
E1	Renewables - DESC should discuss the appropriate modeling of integration costs for renewable resources in the Stakeholder Working Group.	Future	Wellborn
E2	Renewables - DESC should discuss potential impacts of the proposed Environmental Protection Agency ("EPA") CAA Section 111 Regulation of Greenhouse Gas ("GHG") Emissions from Fossil Fuel-Fired Electric Generating Units ("EGU") rule change in Rebuttal Testimony.	2023 IRP	Hayet
F1	Retirements/New Resources - DESC should provide justification explaining the reasonableness of the significant cost increases associated with generic CT resources in Rebuttal Testimony.	2023 IRP	Hayet
F2	Retirements/New Resources - DESC should explain in Rebuttal Testimony why the CC heat rate assumptions are not overly optimistic and confirm this is the technology the Company is considering for the Joint CC unit.	2023 IRP	Hayet

Item	ORS Recommendations	2023 IRP or Future IRP	Person Responsible
F3	Retirements/New Resources - DESC should perform one additional modeling sensitivity of the Reference Case assuming higher battery costs based on the market data provided in the RFP conducted in Docket No. 2021-93-E. The Company should also correct the fixed Operating and Maintenance (“FO&M”) costs modeling error identified by Sierra Club. This information should be provided when the Company files Rebuttal Testimony.	2023 IRP	Hayet
F4	Retirements/New Resources - DESC should provide additional clarification of the Transmission Impact Analysis (“TIA”) Cases, and further explain how the results will be used to make a final decision about the replacement capacity selected for the Wateree units in Rebuttal Testimony.	2023 IRP	Hayet
F5	Retirements/New Resources - DESC should provide additional support for the capital and O&M costs modeled assuming continued operation at Wateree and Williams in Rebuttal Testimony.	2023 IRP	Hayet
G1	PLEXOS Benchmarking - DESC should be required to conduct production cost model benchmark studies on an on-going basis, such as once every three years ahead of Comprehensive IRP proceedings, and the Company should discuss benchmarking results in the Stakeholder Working Group.	Future	Wellborn
G2	Risk Analysis - DESC should evaluate additional ways to incorporate robust risk analyses such as assessing portfolios across multiple planning scenarios. As part of this evaluation, the Company should consider the importance of making near-term decisions that feed into the Company’s Action Plan. The Company should discuss this topic in the Stakeholder Working Group.	Future	Hayet
G3	Transmission - DESC should update the Commission on the transmission impacts and the natural gas pipeline capacity availability associated with unit retirements and new resource decisions. The Company should file the results of the 2023 TIA Study, including all workpapers and supporting documentation when it becomes available.	Future	Hayet

1
2 **Q. WHAT DID ORS RECOMMEND REGARDING THE RESERVE MARGIN ISSUE**
3 **(A1)?**

4 A. Recommendation A1 concerns the Reserve Margin Study methodology the
5 Company used to evaluate system reliability based on a Loss of Load Expectation
6 (“LOLE”) metric. DESC retained Astrapé Consulting (“Astrapé”) to perform the resource

adequacy analysis using Astrapé's SERVIM model. As part of the analysis, Astrapé developed an extreme load/weather statistical regression model. ORS's Report noted the importance of the model, and while ORS did not identify any specific concerns, ORS recommended the Company continue to review the methodology and demonstrate that the models reasonably reflect winter loads during extreme low temperatures in future IRPs. ORS also recommended that the Company report on the findings in the Stakeholder Working Group.

Q. HAS THE COMPANY REASONABLY ADDRESSED ORS'S RESERVE MARGIN RECOMMENDATION?

A. Yes. Witness Wintermantel recognized the modeling of load response to extreme low temperatures is sensitive and warrants further review, which the Company agreed to do. Witness Wintermantel also stated the Company's findings would be discussed with the Stakeholder Working Group in a future IRP.⁴

Q. WHAT RECOMMENDATION DID ORS MAKE REGARDING THE COMPANY'S COMMODITY PRICE FORECASTS (D1)?

A. ORS determined the Company's 2023 IRP commodity price forecasts (natural gas, coal, and CO₂) were reasonable. However, ORS's Recommendation D1 proposed the Company continue to hold discussions in the Stakeholder Working Group regarding the commodity forecasts, given the impact that commodity forecasts have on driving the IRP results.

Q. DID THE COMPANY ADDRESS THIS RECOMMENDATION IN REBUTTAL?

⁴ Rebuttal Testimony of Nick Wintermantel, Docket No. 2023-9-E, p. 2, ll. 15-19.

1 A. Yes. Witness Best agreed to ORS's recommendation to continue to evaluate and
2 discuss commodity forecasts in the Stakeholder Working Group.⁵

3 **Q. WHAT RECOMMENDATION DID ORS MAKE REGARDING POTENTIAL**
4 **IMPACTS OF THE PROPOSED ENVIRONMENTAL PROTECTION AGENCY**
5 **(“EPA”) CLEAN AIR ACT (“CAA”) SECTION 111 REGULATION OF**
6 **GREENHOUSE GAS (“GHG”) EMISSIONS FROM FOSSIL FUEL-FIRED**
7 **ELECTRIC GENERATING UNITS (“EGU”) RULE (“PROPOSED RULE”) (E2)?**

8 A. The EPA issued the Proposed Rule on May 23, 2023, which was months after
9 DESC filed the 2023 IRP Report in January 2023. The Company's 2023 IRP noted that the
10 EPA was working to draft a new set of guidelines, but the Company did not address the
11 rule in the 2023 IRP, as it stated, “it will perform an analysis when the proposed standards
12 become law.”⁶ ORS recognized the timing limited the Company from analyzing the
13 Proposed Rule in the 2023 IRP; however, ORS recommended the Company discuss the
14 possible impacts of the Proposed Rule in Rebuttal Testimony.

15 **Q. DID DESC’S REBUTTAL TESTIMONY ADDRESS THIS RECOMMENDATION?**

16 A. Yes. Witness Best noted the EPA's action is only a proposal at this point,⁷ and
17 Witness Walker discussed the potential impacts of the Proposed Rule on DESC's system.
18 Witness Walker explained the Proposed Rule allows for two primary compliance
19 pathways, which is either to incorporate carbon capture and sequestration (“CCS”)
20 technology, or to utilize “green” hydrogen fuel. Witness Walker stated CCS would not be
21 suitable for use in South Carolina given the state's geological conditions and that green

⁵ Rebuttal Testimony of E. Elizabeth Best, Docket No. 2023-9-E (“Best Rebuttal”), p. 3, l. 18-p.4, l. 6.

⁶ DESC Response to ORS Information Request 6-3.

⁷ Best Rebuttal, p. 6, ll. 10-11.

hydrogen is not “commercially-available at scale” which he stated raises issues about whether green hydrogen could be relied on as a fuel source to meet the EPA’s proposed requirements.⁸

Q. IS ORS SATISFIED WITH THE COMPANY’S RESPONSE REGARDING THE EPA’S PROPOSED RULE?

A. Yes. The Proposed Rule is a developing issue, which will have to be addressed in future IRPs, if it is implemented. The Company provided a reasonable preview of the potential impacts of the Proposed Rule, and Witness Best stated the Company will include the Proposed Rule in future Stakeholder Working Group discussions, which is reasonable.⁹

Q. REGARDING RECOMMENDATION F1, WHAT LED ORS TO REQUEST THE COMPANY PROVIDE JUSTIFICATION FOR THE SIGNIFICANT COST INCREASES ASSOCIATED WITH GENERIC CT RESOURCES?

A. ORS’s concern with the Company’s generic CT capital cost assumption stemmed from a review of Appendix B on page 79 of the ORS Report. Table B-1 shows that the frame CT capital costs increased significantly between the 2022 IRP Update and the 2023 Comprehensive IRP (e.g., the Frame 2x increased from \$725/kW to \$1,402/kW). Furthermore, DESC’s CT capital cost assumptions far exceed the capital cost assumption of any other comparable CT resource shown in Table B-1. Witness Walker explained the difference in cost between the 2022 IRP Update and the 2023 IRP was “largely attributable to recent inflationary pressures” and the data was based on “actual market data and trends;”

⁸ Rebuttal Testimony of Andrew Walker, Docket No. 2023-9-E (“Walker Rebuttal”), p. 26, l. 20-p. 28, l. 8.

⁹ Best Rebuttal, p. 6, ll. 14-17.

1 however, he did not explain why the costs increased so much, such that the costs were well
2 above the comparable cost estimates.¹⁰

3 **Q. IS ORS SATISFIED WITH WITNESS WALKER’S EXPLANATION FOR THE**
4 **SIGNIFICANT COST INCREASE IN FRAME CT RESOURCE CAPITAL**
5 **COSTS?**

6 A. While the explanations provided may be valid, the Company should provide
7 additional justification detail in a future Stakeholder Working Group meeting. The
8 Company should provide comparisons of other sources of data to demonstrate the
9 Company’s assumptions are not outliers.

10 However, ORS did not determine the price increase had an impact on DESC’s 2023
11 IRP. First, stakeholders are generally concerned when the Company understates the cost of
12 fossil resources, and in this case the opposite has occurred. Second, as can be seen in
13 Appendix C on page 83 of the ORS Report, even though frame CT capital costs may have
14 been overstated, frame CT resources were still sufficiently selected in each of the modeling
15 scenarios. Finally, the Company has time to discuss this issue with the Stakeholder
16 Working Group and can revise the input assumptions in the 2024 IRP Update if deemed
17 appropriate based on those discussions.

18 **Q. WITH REGARD TO RECOMMENDATION F2, WHAT LED ORS TO REQUEST**
19 **THE COMPANY TO EXPLAIN WHETHER IT USED OVERLY OPTIMISTIC**
20 **COMBINED CYCLE HEAT RATE ASSUMPTIONS?**

21 A. ORS’s concern with the Company’s generic CC heat rate assumptions stemmed
22 from a review of Appendix B on page 79 of the ORS Report, which showed DESC’s CC

¹⁰ Walker Rebuttal, p. 15, l. 12-p. 16, l. 5.

1 heat rate assumptions were low compared to other sources shown on the table. Witness
2 Neely addressed this issue by admitting that the Company made “an error in selecting the
3 heat rate for certain new gas resources.”¹¹

4 **Q. DID THE COMPANY PERFORM ANY ANALYSIS IN WHICH THE HEAT RATE**
5 **ERROR WAS CORRECTED?**

6 A. Yes, in response to the concerns of Witness Stenclik, on behalf of the Sierra Club,
7 the South Carolina Coastal Conservation League, and the Southern Alliance for Clean
8 Energy, the Company performed an additional PLEXOS modeling analysis. Witness Neely
9 explained he reran one of Witness Stenclik’s cases, except Witness Neely changed the
10 input setting that controlled whether CC units could be optimally selected as part of the
11 expansion plan run. Witness Neely included Witness Stenclik’s other modeling changes in
12 the run, including the correction for the heat rate modeling error,¹² and when Witness Neely
13 allowed CC units to be selected if economic, he still found that “[t]his analysis chose to
14 build the 2x1 CC unit in 2031.”¹³ Therefore, the CC heat rate error did not affect the
15 decision to select a CC unit as the replacement for the Williams unit.¹⁴

16 **Q. IS ORS SATISFIED THAT THE COMPANY’S IRP RESULTS ARE**
17 **REASONABLE GIVEN THE ADDITIONAL MODELING ANALYSIS THE**
18 **COMPANY PERFORMED?**

19 A. Yes. ORS is satisfied the CC heat rate modeling error did not bias the 2023 IRP
20 modeling results; however, the Company should correct the modeling error in future IRP’s.

¹¹ Rebuttal Testimony of James Neely, Docket No. 2023-9-E (“Neely Rebuttal”), p. 14, ll. 11-12.

¹² Table 5 starting on page 59 of Stenclik Direct Testimony indicates that Witness Stenclik’s case included the heat rate modeling error correction.

¹³ Neely Rebuttal, p. 28, ll. 20-21.

¹⁴ See also Best Rebuttal, p. 18, ll. 3-10.

Q. PLEASE EXPLAIN THE ORS'S CONCERN WITH BATTERY STORAGE MODELING COSTS THAT LED TO RECOMMENDATION F3.

A. The ORS Report noted two concerns regarding certain battery storage cost assumptions that were used in DESC's 2023 IRP modeling analyses. The first related to battery storage capital costs. In response to ORS Information Request 2-9b, the Company explained that recent market data obtained in the Urquhart RFP Proceeding showed the battery storage capital costs the Company used were significantly understated. The data the Company used was based on 2022 National Renewable Energy Laboratory ("NREL") data. Second, the ORS Report noted the Sierra Club identified an error in which the Company overstated the fixed O&M cost assumption for one of the selectable battery storage resources. Based on these issues, ORS recommended an additional modeling analysis be performed using updated battery storage cost assumptions.

Q. HOW DID THE COMPANY RESPOND?

A. Witness Best confirmed the battery storage capital costs the Company used in the 2023 IRP modeling analyses were understated as she explained:

The new NREL forecasts are approximately 45% higher than NREL's 2022 forecast which was used in preparation of the 2023 IRP, and the recent RFP results show prices that are higher still. This new price data emerged after the IRP was completed and will be used in the 2024 IRP Update which is due to be filed March 31, 2024.¹⁵

Q. WHAT CONCLUSION DID DESC REACH REGARDING THE BATTERY STORAGE MODELING ASSUMPTIONS?

A. DESC concluded the additional analyses could wait for the 2024 IRP Update proceeding. DESC based the position on the fact that more current and accurate data can

¹⁵ *Id.* at 7, l. 19-p. 8., l. 1.

1 always be identified after an IRP filing is made, but unless the data would have a significant
2 impact on near term decisions, the data could be updated in the next IRP proceeding.
3 Witness Best supported the position by explaining that with regard to replacing the
4 Williams capacity, “battery storage is neither feasible nor economical for fully replacing
5 Williams,”¹⁶ and with regards to replacing the Wateree capacity, “it has always been
6 DESC’s intention to base the selection of replacement capacity on an RFP that would test
7 the relative cost of battery storage and CT capacity through actual market bids.”¹⁷

8 **Q. DOES ORS AGREE THAT FURTHER ANALYSIS USING UPDATED BATTERY**
9 **STORAGE COSTS MAY BE CONDUCTED IN THE 2024 IRP UPDATE?**

10 A. Yes. At this point, the most important supply-side resource planning decisions
11 DESC has to address are the retirements of the Williams and Wateree units. The Preferred
12 Plan indicates that Wateree will retire by 2028 and Williams by 2030, assuming appropriate
13 replacement capacity can be added. The Company has more work to do to evaluate the
14 replacement capacity options for these units, which will require ongoing resource planning
15 studies to be performed that will be reflected in the 2024 IRP Update proceeding. An
16 updated analysis with more current battery storage data would not change the decisions the
17 Company has to make in the near term. Furthermore, the Company’s position that the next
18 step to evaluate replacement capacity for Wateree would be an RFP process in which the
19 Company would “base the selection of replacement capacity on an RFP that would test the
20 relative cost of battery storage and CT capacity through actual market bids”¹⁸ is reasonable.

¹⁶ *Id.* at 8, ll. 2-4.

¹⁷ *Id.* at 8, ll. 5-8.

¹⁸ *Id.*

Q. RECOMMENDATIONS F4 AND G3 ADDRESS ISSUES RELATED TO THE RETIREMENT OF THE WATEREE AND WILLIAMS UNITS. PLEASE EXPLAIN THE REASON FOR ORS’S RECOMMENDATIONS.

A. The objective of ORS’s recommendations was to better understand DESC’s plans for transmission upgrades and additional natural gas pipeline capacity, which would be required to add replacement capacity in order to retire the Wateree and Williams coal units. Collectively, the two recommendations requested DESC to provide information, including a status update of the Company’s Transmission Impact Assessment (“TIA”) results and pipeline construction activities, and a description of how that information will be used to make a final decision about replacement capacity.

Q. DID THE COMPANY PROVIDE THIS ADDITIONAL INFORMATION?

A. Yes. Witnesses Best, Neely, Parker, and Walker all provided information to address the ORS questions. Witness Parker, who is DESC’s Manager of Transmission Planning explained the 2021 TIA analysis determined the cost of transmission upgrades needed to replace Williams is \$309 million, which Witness Neely used in the modeling analyses he performed. Witness Parker explained from the 2022 TIA analyses, DESC determined it would be infeasible to replace Williams earlier than 2030 with 100% battery storage resources located at the Williams site.¹⁹

The question of whether some amount of battery storage resources located at the Williams site could be economic and reduce the cost of transmission upgrades needs to be investigated by the Company. For example, Witness Best stated, “[a]dding a 200 MW battery would result in a reduction of approximately 37% in transmission cost and a

¹⁹ Rebuttal Testimony of Scott Parker, Docket No. 2023-9-E (“Parker Rebuttal”), p. 4, ll. 6-10.

1 reduction in the construction schedule from six to four and a half years.”²⁰ While 200 MW
2 of battery storage capacity would not be sufficient to fully replace the Williams capacity,
3 adding battery storage capacity should be examined further as a means of possibly reducing
4 the overall cost of replacement capacity. Witness Parker mentioned the 2023 TIA “is
5 forthcoming that will quantify the transmission cost and schedule to support a large
6 combined cycle natural gas unit located at Canadys which DESC and Santee Cooper could
7 construct as a joint project.”²¹

8 **Q. DID THE COMPANY STATE IT WOULD PROVIDE FURTHER INFORMATION**
9 **TO UPDATE THE COMMISSION AND STAKEHOLDERS?**

10 A. Yes. As an additional response to ORS’s request for an update on the status of
11 transmission impacts and pipeline activity, Company witness Best stated DESC “will
12 update the Commission by letter at the time of the hearing and in the 2024 IRP Update
13 which will be filed in March of 2024, only four months after a final order will be issued in
14 this proceeding.”²² The Company’s approach is reasonable, and ORS requests the
15 Company especially provide details regarding the 2023 TIA study, the status of pipeline
16 activity, and any other requirements necessary for acquiring replacement capacity for both
17 Wateree and Williams. It also would be helpful for the Company to explain the Company’s
18 latest timeline and plans for acquiring the replacement capacity.

²⁰ Best Rebuttal, p. 12, ll. 6-8.

²¹ Parker Rebuttal, p. 7, ll. 9-12.

²² Best Rebuttal, p. 4, ll. 15-18.

Q. WITH REGARD TO RECOMMENDATION F5, WHAT LED ORS TO REQUEST THE COMPANY TO PROVIDE ADDITIONAL SUPPORT FOR HOW THE WATEREE AND WILLIAMS CAPITAL AND O&M COST ASSUMPTIONS WERE DERIVED?

A. The Company performed two Supplemental modeling cases in which the Williams retirement date was considered to be in 2047 instead of 2030. In reviewing those cases, ORS sought discovery regarding the Williams capital and O&M assumptions. ORS still had questions at the time of filing Direct Testimony and requested the Company supply additional information in Rebuttal Testimony. ORS's objective is to ensure that any economic analyses performed considering coal unit retirement dates use reasonable fixed cost assumptions. Witness Walker provided details about how DESC's Resource Planning Group developed cost estimates, and he explained the Company applied "generally applicable escalation factors" to develop long term capital and O&M forecasts.²³

Q. IS ORS SATISFIED WITH THE INFORMATION THAT THE COMPANY SUPPLIED?

A. Yes. At this point the Company's plans are to retire Wateree in 2028 and Williams in 2030. However, with regard to Williams, no retirement decision for the unit has to be made immediately and the Company can continue to evaluate the retirement date in future IRPs. With regard to the fixed cost modeling assumptions, Witness Walker stated:

But this is an issue that may be worthy of additional study and DESC is happy to continue to discuss these cost inputs in the context of the on-going stakeholder process for the IRP.²⁴

²³ Walker Rebuttal, p. 12, ll. 1-8.

²⁴ *Id.* at 13, ll. 13-15.

Q. WHAT RECOMMENDATION DID ORS MAKE REGARDING RISK ANALYSIS (G2)?

A. Recommendation G2 requested DESC evaluate additional ways to incorporate robust risk analyses in IRP studies. The Company already evaluates risk in a number of ways, including using the Mini-Max Regret Metric, and conducting scenario and sensitivity analysis; however, there may be other approaches used in the industry that the Company could identify and evaluate.

Q. DID DESC ADDRESS THIS RECOMMENDATION IN REBUTTAL TESTIMONY?

A. Yes. Witness Best agreed to ORS's recommendation to continue evaluating risk analysis approaches and to discuss the Company's findings with the Stakeholder Working Group.²⁵

Q. WILL YOU UPDATE YOUR SURREBUTTAL TESTIMONY BASED ON INFORMATION THAT BECOMES AVAILABLE?

A. Yes. ORS fully reserves the right to revise its recommendations via supplemental testimony should new information not previously provided by the Company, or other sources, become available.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

²⁵ Best Rebuttal, p. 3, l. 18-p. 4 l. 12.